

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROBERT SLVESTER KELLEY,
also known as "R. Kelly"

Case No. 19 CR 567

Honorable Martha M. Pacold

**GOVERNMENT'S MOTION TO STRIKE
DEFENDANT'S MOTION FOR TEMPORARY FURLough [DKT. 480]**

Robert Kelly is a serial sexual predator. For years, he abused girls as young as 14, 15, and 16 years old. He even documented his sexual abuse of children on film—creating child pornography—such that the abuse would live on in perpetuity. That abuse and harassment continues with defendant's latest filing.

On September 14, 2022, after a month-long jury trial, a jury convicted defendant Robert Kelly of three counts of creating child pornography, in violation of Title 18, United States Code, Section 2251(a), and three counts of inducing children to engage in criminal sexual abuse, in violation of Title 18, United States Code, Section 2422(b). Dkt. 93, 334. Throughout the trial, the lead up to the trial, and at Kelly's sentencing, this Court ordered that the child victims be referred to by pseudonym. There was no question that this was and remains the protocol. The Court did not even allow the courtroom sketch artists to depict the victims' faces, in order to protect their privacy.

Despite this, in his latest filing, Kelly referred to one of the child victims multiple times by her real name. This is improper. The Court should exercise its

discretion to strike this improper material pursuant to Federal Rule of Civil Procedure 12(f), and strike the entirety of defendant's filing, permitting defendant to refile his motion with the child victim's name appropriately anonymized.¹

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

By: /s/ Jason A. Julien
JASON A. JULIEN
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¹ Defendant is aware of the specific pseudonym that is assigned to the child victim that defendant identified in his motion.

CERTIFICATE OF SERVICE

I, Jason A. Julien, an attorney, certify that I served a copy of the foregoing Government's Motion to Strike Defendant's Motion for Temporary Furlough by filing the same using the CM/ECF System, and that a copy will be provided to all parties of record designated to receive notice.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

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